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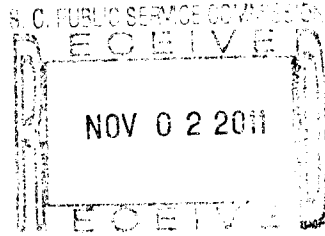
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November 1, 2011

U.S. MAIL ☒ FACSIMILE ☐ FEDERAL EXPRESS ☐ EMAIL ☒

Michael A. Molony, Esq.  
Young Clement  
P.O. Box 999  
Charleston, SC 29402

Re: Kiawah Island Utility, Inc.  
Our File No.: 5435-007

Dear Michael:

Enclosed please find Applicant's Interrogatories and Production Requests to Intervenor Kiawah Property Owners Group. By U.S. Mail I am providing a copy to the Chief Clerk of the PSC and by Email to all counsel of record.

With kind regards, I am,

Sincerely,

PRATT-THOMAS WALKER, P.A.

G. Trenholm Walker

Enclosure (As Stated)  
GTWnjdmd

c: Jocelyn Boyd, Chief Clerk and Administrator  
F. David Butler, Esq. (via Email)  
C. Duke Scott, Executive Director (ORS) (Via Email)  
Jeffrey M. Nelson, Esq. (ORS) (Via Email)  
Shannon Bowyer Hudson, Esq. (ORS) (Via Email)  
Jason Scott Luck, Esq. (KICA) (Via Email)  
John P. Seibels, Jr., Esq. (KICA) (Via Email)

Becky Dennis (Via Email)  
John F. Guastella (Via Email)  
Steve Heyboer (Via Email)  
Robert L. Brooke, Esq. (Via Email)  
Townsend Clarkson (Via Email)

BEFORE



THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2011-317-WS

IN RE: Application of Kiawah Island Utility, )  
Incorporated for Adjustment of Rates )  
and Charges )  
\_\_\_\_\_) **APPLICANT'S  
INTERROGATORIES AND  
PRODUCTION REQUESTS TO  
INTERVENOR KIAWAH  
PROPERTY OWNERS GROUP**

TO: YOUNG CLEMENT RIVERS, LLP, ATTORNEYS FOR INTERVENOR KIAWAH  
PROPERTY OWNERS GROUP, INC

The Applicant, Kiawah Island Utility, Inc. ("KIU" or "Applicant") hereby propounds the following Interrogatories and Requests for Production on Intervenor Kiawah Property Owners Group ("KPOG") and requests responses to be provided to the undersigned on or before 20 days after the date of service hereof in accordance with the procedures outlined in Reg. 103-833. "You" as used herein shall refer to KPOG.

**Interrogatories**

1. Give the names and addresses of persons known to the parties or counsel to be witnesses concerning the facts of the case and indicate whether or not written or recorded statements have been taken from the witnesses and indicate who has possession of such statements.
2. For each person known to the parties or counsel to be a witness concerning the facts of the case, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.

3. Set forth a list of photographs, plats, sketches, or other prepared documents in your possession of the party that relate to the positions advanced by KPOG in this proceeding.
4. Describe the process and procedures followed by KPOG to authorize KPOG to intervene in this proceeding.
5. Does KPOG charge for membership on an annual basis and, if so, how much?
6. If you charge for membership, how many properties on Kiawah Island paid at least the minimum annual membership for the last calendar year?
7. What were the vote tallies in the last two elections for board positions of KPOG (i.e., how many votes cast and for which candidates)?
8. Describe in detail any studies, reports or analysis you or your consultants have made of the rates and charges of KIU, the proposed rates and charges of KIU, or any other matter at issue in this rate proceeding.
9. If you are contending that adjustments should be made by the Public Service Commission ("PSC" or "Commission") to numbers on the schedules submitted by KIU with its application, describe for each such adjustment the following:
  - a) The nature of the adjustment, including the specific line item involved;
  - b) The amount of the adjustment;
  - c) The factual basis for the adjustment;
  - d) The witness who will testify to such adjustment; and
  - e) The qualifications of the witness to testify to the adjustment.
10. If you intend to present expert testimony, provide the following information as to each expert:

- a) The name and address of the expert witness;
  - b) The qualifications of the expert, including a current curriculum vitae;
  - c) The substance of the opinions of the expert; and
  - d) The factual basis underlying such opinions.
11. If you contend that any of the modifications to the rates and charges requested by the Applicant are not reasonable or fair or otherwise should not be approved by the PSC, provide the following information with respect to each such modifications to such rate or charge:
- a) The particular rate or charge involved;
  - b) Your contention as to why the requested modification is unreasonable;
  - c) The factual basis substantiating your contention;
  - d) The amount that you consider reasonable for such rate or charge; and
  - e) The factual basis for your contention that the rate or charge you are proposing is reasonable.
12. If you contend that the allocated cost of each class of service – water (other than golf), sewer, golf potable water, golf well water, and golf treated effluent – is different from that set forth in the Schedules to the Application, describe in detail the following for each category of service:
- a) The class of service involved;
  - b) Your contention as to the total of the fixed and variable costs for providing such category of service;
  - c) The factual basis, including work papers, underlying your calculation.

13. If you contend that any of the physical assets listed in the depreciation schedules attached to the Application are classified in an incorrect category, identify for each such line item the following:
- a) The item involved and the particular classification used by the Utility;
  - b) Your contention as to the correct classification of the item; and
  - c) The factual basis underlying your contention of misclassification.

#### **Production Requests**


1. All studies, reports, and analyses you or your consultants have made of the rates and charges of KIU, the proposed rates and charges of KIU, or any other matter at issue in this rate proceeding.
2. All pro formas, reports, studies, or analyses prepared by your expert witnesses.
3. All written communications with the KPOG members or membership at large about the pending rate application of KIU.
4. Records showing the members who paid membership dues or made membership donations for calendar year 2010.
5. The bylaws of KPOG.
6. Minutes of the board of KPOG in which any matter related to this rate proceeding was discussed or acted upon.
7. All correspondence of every kind and description, including e-mail and other electronic communications, between KPOG and members of Council of the Town of Kiawah Island in which any matter related to this rate proceeding was discussed.

8. All newsletters, bulletins, and eblasts to KPOG members over the last year discussing or mentioning KIU.

9. All documents and other things you intend to introduce into evidence at trial.

These Interrogatories and Production Requests are deemed to continue until the date of the hearing on November 30, 2011. If any additional information comes to your attention that would require supplementation of your responses to these Interrogatories, such responses should be promptly supplemented.

PRATT-THOMAS WALKER, P.A.

By:   
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F: (843) 727-2231  
[gtw@p-tw.com](mailto:gtw@p-tw.com)

ATTORNEYS FOR KIAWAH  
ISLAND UTILITY, INC.

November 1, 2011

Charleston, South Carolina